

REMARKS/ARGUMENTS

Applicant responds herein to the Office Action dated August 17, 2005.

Claims 1-8, 10, 12, 14-25, 27, 28, 34-41, 48 and 56 stand rejected under 35 U.S.C. §102(e) on grounds of anticipation by Franklin (6,105,069). Further, claims 9 and 29 stand rejected under 35 U.S.C. §103(a) as obviousness over Franklin. Still further, claims 11, 13, 26, 46, 47, 50-52, 54 and 55 stand rejected under 35 U.S.C. §103(a) as obviousness over Franklin, in view of Mangat (6,049,799). Claims 42 and 43 stand rejected under 35 U.S.C. §103(a) as obviousness over Franklin and Todd (5,867,714). Claims 49 and 53 stand rejected under 35 U.S.C. §103(a) as obviousness over Franklin and Todd, in further view of Elmasri "Fundamentals of Database Design". Lastly, claim 57 stands rejected under 35 U.S.C. §103(a) as on the grounds of obviousness over Franklin, in view of Melchione (5,930,764).

Reconsideration is requested in view of the following remarks.

Applicants' claim 1 is directed to a reporting tool that comprises a "knowledge base facility" that includes an "*independent* first database" that holds "an inventory list of a plurality of software product data records" and an "*independent* second database" that holds "a plurality of software agreement data records" (emphasis added). Applicants' reporting tool is unique in that a "linking data facility" is included "which links each of a plurality of [the] software product data records with one or more corresponding records of [the] software agreement data" and further comprises a "query tool that receives and acts on queries from a user for linked data records[.]" Thus, users can formulate distinct queries for linked data from the two independent databases. Applicants' other independent claims, namely claims 14, 34 and 40 include similar features.

As noted in applicants' previous response of June 1, 2005, the primary Franklin reference is essentially a license manager. Its title "Licensing Controller Using Network Directory Services" describes its basic functionality. In particular, the Franklin reference is directed to network directory services, as provided by Novell, Inc. ("Novell"), and to managing "control access" and/or "control a resource" of a software product (see, for example, the Abstract, Figs. 3-13, column 2, lines 29-67 and column 3, lines 1-10). Thus, Franklin clearly affects operation of software, and describes an add-on software application, referred to in Franklin as the "snap-in" modules that extend familiar administration tools presently used, for example, in Novell NetWare networks' NW Admin."

Nothing in Franklin teaches or suggests at least two independent databases, one respectively containing “software product data records” and one respectively containing “a plurality of software agreement data records,” nor does it teach applicants’ “linking data facility.” Instead, Franklin teaches a plurality of objects, each of which appears to have a fixed structure. Those objects that contain licensing information, for example, to control operation of software, include a hybrid of information, such as related to a software application and related to a license. Franklin does not describe a single object respectively containing licensing information and another object respectively containing software product data. Furthermore, Franklin does not teach or suggest independent databases, one respectively containing “software product data records” and one respectively containing “a plurality of software agreement data records.” Further, any linking described in Franklin relates to the Novell computing environment, and refers, for example, to linking a user to a respective resource. Applicants respectfully submit that Franklin’s “objects” are patentably distinct from applicants’ claimed reporting tool.

Regarding the passages in Franklin cited by the Examiner as teaching elements of applicants’ claims (e.g., column 4, line 17-column 5, line 50, column 2, lines 29-33, and column 10, lines 50-60), applicants have carefully reviewed these passages and respectfully submit that the passages do not teach or suggest applicants’ claimed features. More particularly, column 4, line 17-column 5, line 50 refers to a general computer “node,” a “router,” Novell’s directory services system, a generic description of “container objects,” a generic description of attributes of objects, and user objects (such as defined by a Netware network administrator). Column 2, lines 29-33 refer to a Novell network directory services database that is defined by a network administrator to assign linking rights, assignments or the like to users and/or groups of users. This passage is patentably distinct from applicants’ claimed independent databases and “linking data facility.” Moreover, column 10, lines 50-60 refer to linkages that are provided by a network administrator, such as when a consumer object (e.g., a unique user name assigned by the network administrator) is linked to a resource object (e.g., a printer). This is, similarly, patentably distinct from applicants’ “linking data facility.” Thus, a careful review of Franklin has not elicited any teaching or suggestion that would anticipate applicants’ claims.

With respect to the Examiner’s assertion that Franklin teaches reporting, e.g., for maintenance functions, Applicants acknowledge that virtually every license manager inherently includes at least some “non-functional” features. For example, license managers may have fields

that identify individuals who would be permitted access to a particular piece of software. Such features, however, do not anticipate at least applicants' claimed first and second independent databases, and applicants' claimed "linking data facility."

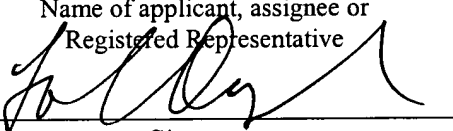
Therefore and in view of the foregoing, Franklin, which is relied upon as the primary reference for the rejection of each and every one of the independent claims, does not anticipate applicants' independent claims. Therefore, each of the independent claims in the application and each of the dependent claims which imposes and includes limitations which are more specific than those that are found in the independent claims is submitted to be patentable over the prior art of record.

Accordingly, the Examiner is respectfully requested to reconsider the application, allow the claims as amended and pass this case to issue.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class Mail in an envelope addressed to: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450, on November 17, 2005:

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Name of applicant, assignee or
Registered Representative

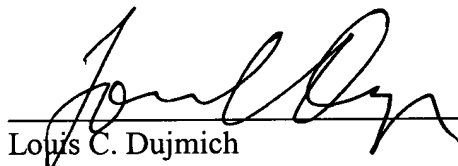


Signature

November 17, 2005

Date of Signature

Respectfully submitted,



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